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January 23, 2015

Via ECF

The Honorable Joseph E. Irenas, U.S.D.J.
U.S. District Court for the District of New Jersey
Mitchell H. Cohen Federal Building and U.S. Courthouse, 5A or 1
4th & Cooper Streets
Camden, New Jersey 08101

Re: *Cipher Pharmaceuticals, Inc., et al v. Actavis Laboratories FL, Inc., et al.*
Civil Action No. 13-6502 (JEI)(AMD) [Consolidated]

Dear Judge Irenas:

This Firm represents Plaintiffs Cipher Pharmaceuticals, Inc., Galephar Pharmaceutical Research, Inc., Ranbaxy, Inc. and Ranbaxy Pharmaceuticals, Inc. (collectively, "Plaintiffs") in the above-captioned case. We submit this letter jointly with counsel for Defendants Actavis Laboratories FL, Inc., Andrx Corp., Actavis, Inc. and Actavis Pharma, Inc. (collectively, "Defendants"), to respectfully propose to the Court a schedule for a Claim Construction Hearing as required by the Court's Scheduling Order. (ECF Nos. 58, Ex. A and 59.) The parties met and conferred regarding the schedule on January 21, 2015.

The parties agree that a hearing would be helpful to present the issues set forth in the claim construction papers to the Court. Plaintiffs understand from a discussion with Your Honor's law clerk that the Court's availability in March is likely limited to Fridays in light of a criminal trial starting shortly after President's Day. Thus, the parties propose a Claim Construction Hearing be scheduled for either April 1, 2015 or April 2, 2015.

The parties also believe that expert testimony from their respective experts would be useful to the Court in construing the disputed terms. To the extent the Court believes expert testimony would be useful, the parties believe that each side will need no more than 2 1/2 hours

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to present their arguments and expert testimony. If the Court does not believe that expert testimony would be needed, the parties believe that each side would need no more than 90 minutes to present their arguments.

Finally, the parties are prepared to submit technical tutorials concerning the subject matter of the patents-in-suit should the Court believe such a tutorial would be useful and helpful.

If the Court has any questions regarding the above proposals or suggestions, the parties are available to discuss at the Court's convenience. We thank the Court for its attention to this matter.

Respectfully submitted,

/s/Theodora McCormick
Theodora McCormick

cc: All Counsel of Record (via ECF and Email)